

14-1855 BPG**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**FILED
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AUG 20 2014

I, Special Agent Jeff Stewart, being duly sworn, depose and state:

INTRODUCTIONAT BALTIMORE
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND
DEPUTY
BY

1. I am a Special Agent with the Department of Homeland Security, Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI) assigned to the HSI Frederick, Maryland Office. I have been so employed since August 2010. As part of my daily duties as an HSI Special Agent, I investigate criminal violations relating to child exploitation and child pornography including violations pertaining to the illegal production, distribution, receipt, and possession of child pornography, in violation of 18 U.S.C. §§ 2251, 2252 and 2252A. I have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media. I have also participated in the execution of search warrants, which involved child exploitation and/or child pornography offenses.

2. As a federal agent, your Affiant is authorized to investigate violations of laws of the United States and is a law enforcement officer with the authority to execute warrants issued under the authority of the United States.

3. I am submitting this affidavit in support of a criminal complaint and arrest warrant for Richard Alan BLANK Jr, date of birth XX/XX/1970, 538 National Highway, La Vale, Maryland, 21502 for violation of Title 18, United States Code, Section 2251(a)(Production of Child Pornography). The statements in this affidavit are based in part on information provided by Criminal Investigator Harold Dixon who works for the Allegany County Combined Criminal Investigations Unit (C3I) located in Cumberland, Maryland. Additional information in this affidavit was obtained from documents and reports prepared by Detectives of C3I, and from my

experience and background as a Special Agent of HSI. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. There is probable cause to believe that BLANK employed, used, persuaded, induced, enticed, and coerced Jane Doe, a minor female, to engage in any sexually explicit conduct for the purpose of producing a visual depiction of such conduct, that is, two photographs that were a close up of Jane Doe's anus and vagina with what appears to be the electrical cord of a sexual device known as a vibrator hanging from Jane Doe's vagina as BLANK was engaged in various sexual acts with Jane Doe, and said visual depictions were produced using materials that had been mailed, shipped, and transported in or affecting interstate commerce by any means, that is, with an LG Model VX 11000 cellular telephone which was not produced in Maryland.

Investigation of Richard Alan BLANK Jr.

4. On June 2, 2014, a 15 year old female, hereinafter referred to as "Jane Doe," reported to law enforcement that she had been sexually abused by Richard Alan BLANK Jr. ("BLANK"). On June 6, 2014, Jane Doe was interviewed by the Allegany County Department of Social Services (DSS) and Detective Harold Dixon (C3I). Jane Doe disclosed during the interview that BLANK had sexually abused her numerous times since early May of 2014.

5. This was actually the second time police had responded to a report of BLANK sexually abusing Jane Doe. On May 7, 2014, the police came to Jane Doe's residence because Jane Doe had previously texted a friend in Iowa and indicated that BLANK had sex with her on or about May 5, 2014. When interviewed by the police in connection with that allegation, Jane Doe lied and denied that BLANK had sexually abused her. BLANK also lied and denied there had been any sexual acts/contact with Jane Doe. BLANK later made Jane Doe text everyone she told that

she and BLANK had sex and inform them that she had lied. After that, BLANK did not allow Jane Doe to use her phone or the internet. Due to the denials of Jane Doe and BLANK and lack of corroboration of the claims of sexual abuse at that time, the investigation was considered closed and no charges were filed.

6. However, BLANK's wife harbored suspicions regarding BLANK's sexual abuse of Jane Doe. BLANK's wife had purchased a hidden/covert video camera years earlier to memorialize instances of physical/emotional abuse she was suffering due to BLANK's actions, which she placed in Jane Doe's room, without Jane Doe or BLANK's knowledge, on Friday, May 30, 2014. BLANK's wife returned a while later and recovered the covert video camera from Jane Doe's room and reviewed the footage. BLANK's wife observed BLANK having sexual intercourse on the tape with Jane Doe. BLANK's wife then contacted the police.

7. On June 2, 2014, BLANK's wife met with the C3I investigators to report the sexual abuse of Jane Doe and turned over the covert camera and recorded footage to the C3I investigators. This recording has been reviewed and secured as evidence. Your Affiant reviewed the video and confirmed that it shows Richard Alan BLANK having sexual intercourse with Jane Doe. The video also shows BLANK having a conversation on his cell phone, after which he took photos of Jane Doe while she was nude using the same cell phone.

8. On June 2, 2014, Jane Doe was interviewed regarding the contents of the tape and BLANK's sexual abuse. Jane Doe described the occurrence on the tape as happening sometime after BLANK'S wife left during the late afternoon or early evening of Friday, May 30th. At that time, Jane Doe indicated that BLANK took Jane Doe up to her room so they could have sex while BLANK'S wife was out. BLANK locked the three youngest kids in a room so they would not disturb them. BLANK started by pushing Jane Doe's head down towards his penis because

BLANK wanted Jane Doe to give him a "blowjob" (oral sex), which she did not want to do. Jane Doe relented and BLANK begin inserting his penis into her mouth, but Jane Doe started feeling sick to her stomach so she told BLANK that she had a sore throat and could not. At that time BLANK replied, "Well let's hope it gets better soon, because you're the Queen of deep throating." Then BLANK started to kiss and lick Jane Doe's vagina and anus and then started to kiss and grope her breasts, while BLANK had her, and sometimes himself, use a vibrator on and in her vagina. Then BLANK inserted his penis into Jane Doe's anus. While doing so BLANK got a call from Jane Doe's mother and stopped momentarily, and acted completely normal. Then, when BLANK was off the phone, BLANK took 4 pornographic pictures of Jane Doe, three of which Jane Doe described as close ups of her anus/vagina and one was of her entire body, with her hair covering her face. Then BLANK continued penetrating Jane Doe's anus with his penis until he ejaculated in Jane Doe's anus/rectum.

9. During the interviews on June 2 and 6, 2014, Jane Doe provided details regarding the first instance of abuse, which had actually occurred on or about Monday, May 5th, around 11 p.m. Jane Doe confirmed the text messages that she had sent to her friends were true and that she had not been truthful with the police when interviewed on May 7, 2014. On May 5, 2014, Jane Doe stated that BLANK brought home beer and gave her some. Jane Doe had 6 bottles of beer, threw up, and then went to bed. BLANK got into bed with Jane Doe. While BLANK was lying beside Jane Doe on the bed, Jane Doe was feeling sick. Jane Doe told BLANK that she wished BLANK would kiss her, but nothing more. Then BLANK started talking about how if they kissed, that he wouldn't be able to stop. BLANK indicated that he had been fighting urges to do things with her since the day she arrived, because even though she was only 15, she looked like she was around 22. She felt sick still, and very out of it. When they started kissing, Jane Doe didn't think it seemed

real. At first, before they started kissing, BLANK gave her a peppermint stick. After Jane Doe put it in her mouth, BLANK took it out of her mouth using his mouth, which is how the kissing started. Then BLANK had her unzip her pajamas and insert a peppermint stick into her vagina, and then feed it to him. Then BLANK started kissing and groping her. Jane Doe was still drunk and did not completely remember what happened. All Jane Doe remembered after that is that her bra came off and BLANK started "sucking on her nipples" and "fingering her" (inserting his fingers into her vagina). BLANK had her start to give him a "hand-job" (digitally manipulating his penis) and then pushed her head down and had her give him a "blowjob" (oral sex or fellatio). Later the rest of her clothes came off completely. Jane Doe indicated that BLANK's penis penetrated her vagina and anus. Then Jane Doe did not remember why, but BLANK had her put back on all her clothes, and go down into the laundry room in the basement. Jane Doe believed it was so they could be louder and not get caught. BLANK followed her down there and made her lean over on the freezer where BLANK continued penetrating her anus with his penis (he'd taken off her pajamas again). Then BLANK picked her up and sat her on the freezer, and penetrated Jane Doe's vagina with his penis until BLANK ejaculated inside of her vagina. BLANK then gave Jane Doe baby wipes and instructed her try to push out his semen so she would not get pregnant. BLANK put the wipes Jane Doe had used following vaginal sex with him in a bag which he threw away after the police left the residence on May 7th.

10. During the June 2 and 6, 2014 interviews with law enforcement, in addition to providing details about the first occurrence (see supra at ¶ 9) and the occurrence recorded by BLANK's wife on video (see supra at ¶ 8), Jane Doe described a total of eight similar occasions where Richard Alan BLANK Jr. had sexually abused her, to include BLANK inserting his penis

into Jane Doe's mouth, vagina, and anus, as well as acts of bondage.

11. On June 2, 2014 investigators interviewed Richard Alan BLANK and he denied that he had sexually abused Jane Doe. BLANK was arrested and requested to be promptly presented to court and then the interview was terminated. At the time of his arrest, BLANK's LG Model VX 11000 cell phone was seized from him and secured. Ultimately, C3I investigators applied for a search warrant to seize and search the contents of said phone.

12. On June 2, 2014 investigators from C3I also executed a search warrant on BLANK's residence, located at 538 National Highway, La Vale, Maryland, 21502. Investigators did not recover any additional computers or digital storage media, but did seize bedding, a tube of lubricant, a sexual device known as a vibrator, and a scarf. A preliminary and initial search of BLANK's black LG Model VX 11000 cell phone pursuant to the search warrant revealed two nude photos of Jane Doe. The photos were from May 30, 2014 while Jane Doe was forced to have sexual intercourse with BLANK. These two photos were taken during the same time the hidden/covert camera recorded the event. The first of the two nude photos of Jane Doe recovered from BLANK'S cell phone depict Jane Doe on top of the white comforter on her bed with her knees bent and her buttocks in the air, with her face and shoulders resting on the comforter, as Jane Doe is using her hands to spread open her anal cavity which is reddened and shiny as if lubricated. A white and blue tube is next to her on the bed. A gold ring is on her left ring finger. There appears to be a thin electrical wire running out of her vagina and between her legs. Jane Doe's head is turned to the left and the left side of her face is partially visible.

13. The second nude photo of Jane Doe is a close up of Jane Doe's vagina/anus as she is in the same position as described in ¶ 12.

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14. BLANK was charged in Allegany County with over forty counts related to the sex abuse of a minor and related sex offenses and had his initial appearance there on or about June 24, 2014. BLANK's bond was set initially at \$500,000, but has since been lowered. See Allegany County Circuit Court Case Number 01K14015827. As of the writing of this Affidavit, BLANK remains detained on those charges.

15. Contact with LG confirmed that the LG Model VX 11000 cellular phone was not produced in Maryland. A representative from LG confirmed that all of LG's cellular phones are produced at manufacturing plants in Korea, China, or Mexico.


Conclusion

16. Based upon all the information set forth in this application, your Affiant respectfully submits that there is probable cause to believe that **Richard Alan BLANK Jr.** is in violation of Title 18, United States Code, Section 2251(a).



Jeff Stewart
Special Agent
Homeland Security Investigations

Sworn and subscribed before me
the 19th day of August, 2014.



Beth P. Gesner
United States Magistrate Judge for the
District of Maryland